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Attorneys for Plaintiff
10 UNITED STATES OF AMERICA

11 UNITED STATES DISTRICT COURT

12 FOR THE CENTRAL DISTRICT OF CALIFORNIA

13 UNITED STATES OF AMERICA,

14 Plaintiff,

15 v.

16 ROBERT PAUL RUNDO, et al.,

17 Defendants.
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No. CR 18-00759-CJC

STIPULATION TO CONTINUE PRETRIAL
MOTIONS DEADLINES

CURRENT DATES:

OPENING: 12/7/22
OPPOSITION: 12/21/22
REPLY: 12/28/22
HEARING: 1/9/23

PROPOSED DATES:

OPENING: 2/10/23
OPPOSITION: 3/3/23
REPLY: 3/10/23
HEARING: 3/20/23

22 IT IS HEREBY STIPULATED AND AGREED by and between Plaintiff
23 United States of America, by and through its counsel of record, the
24 Acting United States Attorney for the Central District of California
25 and Assistant United States Attorney Maria Jhai, and defendants
26 ROBERT BOMAN, TYLER LAUBE, and AARON EASON, by and through their
27 attorneys of record, that the pretrial motions deadlines in this
28

1 matter are continued as follows: motions to be filed by February 10,
2 2023; oppositions to be filed by March 3, 2023; replies to be filed
3 by March 10, 2023; and any motions hearing on March 20, 2023, at 9:00
4 a.m. The government will file its first superseding indictment on or
5 before January 3, 2023. Defendant ROBERT PAUL RUNDO takes no
6 position on the stipulation.

7 This request is based on the files and records of this case and
8 the following stipulated representations:

9 1. The defendants in this matter are charged by indictment
10 with violation of the Anti-Riot Act, and Conspiracy, in violation of
11 18 U.S.C. §§ 371, 2101. (Dkts. 47, 162.)

12 2. In June 2019, this Court granted the defendants' motions to
13 dismiss the indictment. (Dkt. 145, 151.) Following reversal and
14 remand by the Ninth Circuit (Dkt. 161), the parties filed a
15 stipulation to continue trial in this matter to April 11, 2023,
16 including setting a briefing schedule for pretrial motions. (Dkt.
17 170.)

18 3. The government represents that it intends to file a first
19 superseding indictment on or before January 3, 2023. The undersigned
20 parties seek a continuance of the motions deadlines in order to allow
21 for anticipated pretrial motion practice addressing the first
22 superseding indictment.

23 4. The government represents that on December 2, 2022, counsel
24 for defendant RUNDO, Julia Deixler, informed the government by email
25 that she takes no position on this stipulation.

26 WHEREFORE, the undersigned parties stipulate and agree to the
27 following revised deadlines, and have prepared a proposed order filed
28 concurrently herewith, consistent with this schedule:

1 • The government shall file a first superseding indictment on or
2 before **January 3, 2023**.

3 • Pretrial motions shall be filed on or before **February 10, 2023**.

4 • Oppositions to pretrial motions shall be filed on or before
5 **March 3, 2023**.

6 • Replies in support of pretrial motions, if any, shall be filed
7 on or before **March 10, 2023**.

8 • The parties request a hearing date of **March 20, 2023**.

9 IT IS SO STIPULATED.

10 Dated: December 5, 2022

Respectfully submitted,

11 E. MARTIN ESTRADA
12 United States Attorney

13 CHRISTOPHER D. GRIGG
14 Assistant United States Attorney
Chief, National Security Division

15 /s/ 

16 SOLOMON KIM
17 MARIA JHAI
Assistant United States Attorneys

18 Attorneys for Plaintiff
UNITED STATES OF AMERICA

19 Dated: December 5, 2022

/s/ *per email authorization

20 PETER C. SWARTH
21 Attorney for Defendant ROBERT BOMAN

22 Dated: December 5, 2022

/s/ *per email authorization

23 JEROME J. HAIG
24 Attorney for Defendant TYLER LAUBE

25 Dated: December 5, 2022

/s/ *per email authorization

26 JOHN NEIL McNICHOLAS
27 Attorney for Defendant AARON EASON
28